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25 Attorneys for Plaintiff
26 NATALY LOPEZ VARGAS

17 **UNITED STATES DISTRICT COURT**
18 **EASTERN DISTRICT OF CALIFORNIA**

20 NATALY LOPEZ VARGAS, an individual, on
21 behalf of herself and all others similarly
22 situated,

23 Plaintiff,

24 v.

25 SAPUTO DAIRY FOODS USA, LLC, a
26 Delaware limited liability corporation; and
DOES 1 through 10, inclusive,

Defendants.

Case No. 1:22-cv-01645-DJC-JDP

**JOINT STATUS REPORT;
STIPULATION AND ORDER TO
MAINTAIN STAY PENDING FINAL
SETTLEMENT APPROVAL**

Complaint Filed: November 21, 2022

TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:

Defendant Saputo Dairy Foods USA, LLC (“Saputo” or “Defendant”) and Plaintiff Nataly Lopez Vargas (“Vargas” or “Plaintiff”) (collectively, the “Parties”), by and through their respective attorneys of record, submit the following Joint Status Report and Stipulation.

STATUS OF LAWSUIT

1. On November 26, 2024, the Court entered the Parties' stipulation to maintain the stay of this action pending final approval of a global settlement that includes this action ("Global Settlement"), which the Parties are currently pursuing through the related action *Martinez v. Saputo Dairy Foods USA, LLC*, Case No. VCU294960 (Tulare Cnty. Sup. Ct.) ("Martinez PAGA Action"), and ordered the Parties to file a joint status report within fourteen days after the hearing on the Parties' Motion for Final Approval of the Global Settlement (the "Final Approval Hearing"). (See ECF No. 35.)

2. On February 10, 2025, the Parties appeared for the Final Approval Hearing in the *Martinez* PAGA Action. The Court heard additional argument regarding Plaintiffs' request for attorneys fees and took the Motion for Final Approval under submission. As of the filing of this status report, the Court has not yet issued a decision on the Motion for Final Approval.

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1 **STIPULATION**

2 **IT IS HEREBY STIPULATED AND AGREED AS FOLLOWS:**

3 1. This action shall remain stayed pending final approval of the Global Settlement
4 through the *Martinez* PAGA Action, Case No. VCU294960 (Tulare Cnty. Sup. Ct.).

5 2. In the event the court does not grant final approval of the Global Settlement in the
6 *Martinez* PAGA Action, the Parties shall return to status quo as existed before this action was
7 stayed.

8 3. The Parties will file a joint status report within fourteen days of a decision on the
9 Motion for Final Approval of the Global Settlement in the *Martinez* PAGA Action.

10 **IT IS SO STIPULATED.**

11 Dated: February 24, 2025

JONES DAY

12 By: /s/ Koree B. Wooley
13 Koree B. Wooley

14 Attorneys for Defendant SAPUTO DAIRY
15 FOODS USA, LLC

16 Dated: February 24, 2025

MATERN LAW GROUP PC

17 By: /s/ Mikael H. Stahle (as authorized on 2/24/25)
18 Mikael H. Stahle

19 Attorneys for Plaintiff NATALY LOPEZ VARGAS

1 **ORDER**
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Having considered the Joint Stipulation between all Parties, and good cause appearing,

IT IS SO ORDERED.

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5 Dated: February 25, 2025

6 /s/ Daniel J. Calabretta
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11 THE HONORABLE DANIEL J. CALABRETTA
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13 UNITED STATES DISTRICT JUDGE
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